

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JOSEPH L. CARPENTER, an individual;)
Plaintiff,) Case No.: 1:15-CV-212-AJT/JFA
v.)
<myschool.com>, a domain name;)
Defendant.)

)

ANSWER TO COUNTERCLAIMS

Plaintiff Joseph Carpenter hereby answers the Counterclaims of Registrant and alleges as follows:

First Affirmative Defense

Plaintiff/Counterclaim-defendant answers the allegations of the numbered paragraphs of the Counterclaims as follows:

ADMISSIONS AND DENIALS

1. Plaintiff admits the averments in ¶ 1 of the Counterclaims.
2. Plaintiff denies the averments in ¶ 2 of the Counterclaims.
3. Plaintiff asserts that the Complaint speaks for itself and denies therefore denies the averments in ¶ 3 of the Counterclaims.
4. Plaintiff denies the averments in ¶ 4 of the Counterclaims with respect to the Counterclaims only.
5. Plaintiff denies the averments in ¶ 5 of the Counterclaims with respect to the Counterclaims only.

6. Plaintiff denies the averments in ¶ 6 of the Counterclaims.
7. Plaintiff denies the averments in ¶ 7 of the Counterclaims.
8. Plaintiff has no information upon which to admit or deny the averments in ¶ 8 of the Counterclaims and therefore denies the same.
9. Plaintiff has no information upon which to admit or deny the averments in ¶ 9 of the Counterclaims and therefore denies the same.
10. Upon information and belief, Plaintiff denies the averments in ¶ 10 of the Counterclaims.
11. Upon information and belief, Plaintiff denies the averments in ¶ 11 of the Counterclaims.
12. Upon information and belief, Plaintiff denies the averments in ¶ 12 of the Counterclaims.
13. Upon information and belief, Plaintiff denies the averments in ¶ 13 of the Counterclaims.
14. Upon information and belief, Plaintiff denies the averments in ¶¶ 14 - 20 of the Counterclaims.
15. Plaintiff denies the averments in ¶¶ 22 - 27 of the Counterclaims as being conclusions of law.
16. Plaintiff denies the averments in ¶ 28 of the Counterclaims.
17. Plaintiff denies the averments in ¶ 29 of the Counterclaims.
18. Plaintiff admits the averments in ¶¶ 30 - 32 of the Counterclaims.
19. Plaintiff denies the averments in ¶¶ 33 - 37 of the Counterclaims.
20. Plaintiff admits the averments in ¶¶ 38 - 39 of the Counterclaims.
21. Plaintiff asserts written documents speak for themselves and therefore denies the averments in ¶ 40 of the Counterclaims.
22. Upon information and belief, Plaintiff denies the averments in ¶ 41 of the Counterclaims.
23. Plaintiff admits the averments in ¶ 42 of the Counterclaims.

24. Plaintiff asserts written documents speak for themselves and therefore denies the averments in ¶¶ 43 - 46 of the Counterclaims.
25. Plaintiff denies the averments in ¶¶ 47 - 53 of the Counterclaims.
26. Plaintiff asserts written documents speak for themselves and therefore denies the averments in ¶¶ 54 - 55 of the Counterclaims.
27. Plaintiff denies the averments in ¶¶ 56 - 59 of the Counterclaims.
28. Plaintiff/Counterclaim-defendant reaffirms and reincorporates its responses to all prior paragraphs as though fully set forth herein.
29. Plaintiff denies the averments in ¶¶ 61 - 66 of the Counterclaims.
30. Plaintiff/Counterclaim-defendant reaffirms and reincorporates its responses to all prior paragraphs as though fully set forth herein.
31. Plaintiff denies the averments in ¶¶ 68 - 75 of the Counterclaims.
32. Plaintiff/Counterclaim-defendant reaffirms and reincorporates its responses to all prior paragraphs as though fully set forth herein.
33. Plaintiff denies the averments in ¶¶ 77 - 84 of the Counterclaims.
34. Plaintiff/Counterclaim-defendant reaffirms and reincorporates its responses to all prior paragraphs as though fully set forth herein.
35. Plaintiff asserts written documents speak for themselves and therefore denies the averments in ¶¶ 86 - 87 of the Counterclaims.
36. Plaintiff denies the averments in ¶¶ 88 - 90 of the Counterclaims.
37. Plaintiff/Counterclaim-defendant reaffirms and reincorporates its responses to all prior paragraphs as though fully set forth herein.
38. Plaintiff admits the averments in ¶ 92 of the Counterclaims.

39. Plaintiff denies the averments in ¶¶ 93 - 97 of the Counterclaims.

Second Affirmative Defense

The Counterclaims fail to state a claim against Plaintiff upon which relief can be granted.

Third Affirmative Defense

The Counterclaims are barred under the doctrine of unclean hands.

Fourth Affirmative Defense

The Counterclaims are barred under the doctrine of waiver, laches, and/or estoppel.

Fifth Affirmative Defense

The Counterclaims may be barred, in whole or in part, to the extent that Counterclaimants alleged damages were caused by other persons, whether named as parties or not.

Sixth Affirmative Defense

Counterclaimants lack standing to assert the causes of action in the Counterclaims.

Seventh Affirmative Defense

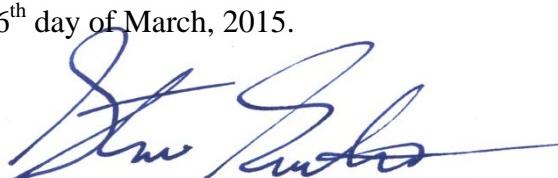
Counterclaimants have failed to name indispensable parties to this action.

Eighth Affirmative Defense

Counterclaim-defendant may be entitled to additional defenses of which it is not currently aware. Therefore, Plaintiff/Counterclaim-defendant reserves the right to update and amend this Answer, and the defenses asserted therein, as additional information and knowledge is obtained through the discovery process.

DATED this the 26th day of March, 2015.

/s/



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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2015 a copy of the foregoing **ANSWER TO COUNTERCLAIMS** was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/ Steven Rinehart
Steven Rinehart